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July 8, 2011 (PBW Project No. 1597)

VIA FEDERAL EXPRESS

Mr. Gary Miller, On-Scene Coordinator U.S. Environmental Protection Agency, Region 6 Superfund Division (6SF-AP) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator U.S. Environmental Protection Agency, Region 6 Superfund Division (6SF-AP) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

RE: REQUEST FOR NOTICE OF COMPLETION OF WORK REMOVAL ACTION
GULFCO MARINE MAINTENANCE SUPERFUND SITE FREEPORT, TEXAS

Dear Mr. Miller and Ms. Engblom:

As you know, Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy), and The Dow Chemical Company (Dow), recently prepared addendum pages to the Final Removal Action Report for the Gulfco Marine Maintenance Superfund Site (the Site). These addendum pages were submitted to you by letter dated June 30, 2011 pursuant to Section VIII, Paragraph 42 of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) and the schedule in Section II.A of the Removal Action Work Plan (Appendix D to Settlement Agreement) for the above-referenced Site. Parker Drilling Offshore Corporation also participated in the Site work under an agreement it reached with the above Respondents.

With the submittal of the Final Removal Action Report addendum pages, all Removal Action activities specified in the Settlement Agreement have now been completed. Accordingly, Respondents request that EPA issue a Notice of Completion of Work pursuant to Paragraph 101 of the Settlement Agreement confirming that all Work has been fully performed in accordance with the Settlement Agreement and that the Settlement Agreement is terminated except for post-removal site controls, if any, payment of Oversight Response Costs; and record retention obligations.

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Thank you for your consideration of this request. Please let me know if you have any questions.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

Eric F. Pastor, P.E. Principal Engineer

cc: Ms. Luda Voskov – Texas Commission on Environmental Quality

Mr. Ray Merrell – Sequa Corporation

Mr. John Eldridge - Haynes and Boone, LLP

Mr. Donnie Belote - The Dow Chemical Company

Mr. Allen Daniels - LDL Coastal Limited, LP (w/o enclosure)

Mr. F. William Mahley - Strasburger & Price, LLP

Mr. James C. Morriss III - Thompson & Knight, LLP

Ms. Elizabeth Webb - Thompson & Knight, LLP

Mr. Jay Winters - Golder Associates, Inc.